

DFARS Clause Established Omission Distribution Nevada Federal Contractor FCI Documentation

Finding 1. Portable Storage Device Boundary Scope

SDVOSB-designated contractors operating in Nevada under federal awards subject to DFARS 252.204-7012 carry Active FCI Posture Records in which portable storage device documentation is verified in one portion of the population and unverified in another. Currency as a record property requires that the documented state address the present device inventory. Accuracy requires that the documented device configurations match the configurations currently deployed. Neither state forecloses the other within the review window. Awarding agency supply chain oversight registers both conditions. Peer contractors operating under the same regulatory framework present both states.

Portable storage devices carry Federal Contract Information. The FCI boundary includes them. The record either addresses their present state or it does not. Documentation either covers the present period or its coverage ends at a prior point. A record in which the documented state and the current state have diverged describes the unverified condition. The boundary includes every device. The record may not.

Finding 2. Device Inventory and Record Currency

The portable storage device inventory changes. Devices are added. Devices are removed. Devices are reassigned. The record is current or it is not current at the point of review. Neither state closes within the period the document addresses. Where the inventory changed and the record did not follow, the currency of the record is unverified. Awarding agency supply chain oversight observes both conditions within the same review period. The record either corresponds to the organization's present FCI exposure or it does not.

Peer contractors operating under the same regulatory framework carry records whose portable device documentation was last confirmed at a specific point. That point may precede the most recent inventory change. A record that reflects a prior configuration of the boundary describes this condition. Documentation either captures the current environment or it captures a prior one. Neither condition removes the other from the record as reviewed. The gap and the posture are both present in the current observation.

Finding 3. Accuracy of Device Configuration Records

Where portable storage device documentation exists, the accuracy property requires that the documented configurations correspond to the configurations currently in use. Both observations are present within the same assessment interval. The record addresses a set of device configurations. The deployed configurations may differ. Documentation either extends to the current environment or it stops before reaching it. A record that addresses the boundary as it existed before the triggering event describes the unverified state among organizations whose device configurations changed following procurement of replacement media.

Awarding agency supply chain oversight registers the condition. The condition and its counterpart are both present at the point of review. Peer contractors operating under the same regulatory framework whose device configuration records were last confirmed before the present configuration carry documentation in which the recorded scope and the present scope have diverged. Documentation either addresses the boundary as it exists now or it addresses an earlier version. The record addresses one set of configurations. The environment contains another.

Finding 4. Media Protection Domain and Record Coverage

Portable storage device documentation falls within the Media Protection domain under the 15 requirements and 6 domains addressed by CMMC Level 1. Each condition is present and neither cancels the other. A verified record reflects the current device inventory and configuration state. An unverified record reflects a prior inventory or a prior configuration. The record either captures the present state of the boundary or it does not. Awarding agency supply chain oversight observes both conditions within the SDVOSB contractor population in Nevada.

Documentation either covers the current boundary or it lapses at that edge. Peer contractors operating under the same regulatory framework whose media protection records were last confirmed before the most recent device change carry a record that has not been updated since the triggering event. Neither resolves the other in the current record state. The currency and the accuracy of the portable storage device record are explicit properties. They are either present or they are not present at the point of review. A record whose last confirmed state predates the most recent boundary-affecting event is unverified.

Finding 5. Self-Qualification and Record State

An organization whose Active FCI Posture Record reflects the current portable storage device inventory, whose currency is verified against the present device state, whose accuracy corresponds to the configurations currently deployed, and whose record produces audit-ready output covering the media protection domain without reconstruction occupies the verified side of this divide. Neither observation forecloses the other. Documentation

either reaches the current environment or it does not reach it.

The SDVOSB contractor population in Nevada presents both conditions across the current assessment cycle. A record that was last updated before the present configuration was established does not address the present device environment. Awarding agency supply chain oversight registers the gap between the last verification point and the current device state. Each observation stands within the same documented interval. The record matches the current environment or it does not. Documentation in which the recorded state and the actual state are not the same is present at the point of review. Documentation that reflects the environment as it existed before the most recent change describes the unverified condition.